



# TOWN OF CLARKSTOWN

GEORGE HOEHMANN  
SUPERVISOR

May 3, 2019

New York State Public Service Commission  
Attn: Hon. Kathleen H. Burgess, Secretary to the Commission  
Empire State Plaza  
Agency Building 3  
Albany, NY 12223-1350

**Re: Proposed Orange & Rockland Little Tor Substation, located at the corner of South Mountain Road and North Little Tor Road in New City**

Dear Hon. Burgess and Members of the New York State Public Service Commission:

The Clarkstown Town Board and I have believed for years that it is not beneficial for our Town to be the site of a new Orange and Rockland ("O&R") Substation in Rockland County. At a recent training session sponsored by Rockland Municipal Planning Federation, O&R representatives presented information that leads me to believe they are finally in agreement with Clarkstown officials and our outspoken community against the placement of a substation on South Mountain Road.

Based on the attached representations (Exhibit A) as well as statements made at the training, it appears that O&R is primed to engage in Non-Wire Alternatives ("NWA") projects in Monsey, Pomona and West Haverstraw over the next two years. As defined by O&R, NWA "provide(s) a solution to an identified system constraint that would otherwise require a traditional infrastructure solution, such as **building a new substation or powerplant.**" (Emphasis added)

The Town of Clarkstown applauds this effort and is pleased with the fact that these NWA projects are being fast tracked for the communities who need the increased load, rather than our having to host a new substation on their behalf, which has generated significant and valid concerns among our residents. Among them are matters of environmental, safety, health, visual and property value impacts along South Mountain

Road, which has a historical designation. On Monday May 1, 2019, the Town of Clarkstown Architectural Historical Review Board met and voted unanimously against the substation approval given the historic road designation.

Additionally the proposed substation is located in a residential neighborhood where the safety and well-being of residents could be put at risk if for instance, an explosion or fire were to occur, especially during a "perfect storm" scenario with high winds, high temperatures and dry brush surrounding the substation.

I wanted to be sure the Public Service Commission is aware of O&R's new approach with their NWA projects and remind you that the Town Board remains in steadfast opposition to the long discussed and erroneously conceived plan to construct a substation in New City. I urge you to exercise oversight authority and review the substation matter in light of public statements made by O&R representatives of NWA projects being undertaken to mitigate the need for substations.

Thank you for your consideration on this matter.

Sincerely,

A handwritten signature in black ink that reads "George Hoehmann". The signature is fluid and cursive, with a long horizontal line extending from the end of the name.

George Hoehmann  
Supervisor, Town of Clarkstown

w/enclosures

Cc:

Orange & Rockland



**Orange & Rockland**

# **Rockland County Planning Federation**

April 1, 2019

# Overview

- Reforming the Energy Vision
- Energy Efficiency Programs
- Non Wire Alternatives
- Solar Interconnection
- Site Plan Project Approval
- Overhead & Underground Utility Easements

# **Reforming the Energy Vision Energy Efficiency**

**Matt Mariconi  
Program Administrator  
Customer Energy Services**



# Non-Wire Alternatives (NWA)

## What are Non-Wire Alternatives?

- An NWA is the application of DER (i.e., energy storage, solar, energy efficiency, demand response) or other technologies to provide a solution to an identified system constraint that would otherwise require a traditional infrastructure solution such as building a new substation or powerplant

## How are NWAs different than traditional solutions?

- T&D deferral
- Utilizes renewable resources
- Reduces reliance on fossil and coal based generation
- Third party participation
- NWA opportunities made available to

stakeholders through its website and hosting capacity maps

## Siting and Permitting

- Siting is a collaborative process between utility, developer, and local AHJ
- DER solutions require close proximity to the load pocket
- Introduction of new DER technologies into existing community infrastructure

# NWA Schedule

Project Name/Description	Project Type	Required Load Relief	Need By Date	Anticipated RFP Release
Monsey	Load Relief/Reliability	15 MW	2020	Evaluating
Pomona	Load Relief	3 MW	2020	Evaluating
West Haverstraw	Reliability	5 MW	2021	Evaluating